

**BRAFMAN & ASSOCIATES, P.C.**

ATTORNEYS AT LAW

256 FIFTH AVENUE, 2ND FLOOR  
NEW YORK, NEW YORK 10001  
TELEPHONE: (212) 750-7800  
FACSIMILE: (212) 750-3906

E-MAIL: ATTORNEYS@BRAFLAW.COM

BENJAMIN BRAFMAN

MARK M. BAKER  
OF COUNSEL  
MARC A. AGNIFILO  
OF COUNSEL  
ZACH INTRATER  
OF COUNSEL

ANDREA L. ZELLAN  
JACOB KAPLAN  
ADMITTED IN NY & NJ  
TENY R. GERAGOS  
ADMITTED IN NY & CA

July 18, 2022

AUSA Jonathan Lax  
United States Attorney's Office  
Eastern District of New York  
271 Cadman Plaza East  
Brooklyn, New York 11201  
Re. United States v. Steven Nerayoff, CR 20-00008(MKB)

Dear Jonathan:

We would like to reiterate our appreciation for our dialogue and hope that it continues to fruition. As part of our efforts to resolve this matter, we believe that the Government may have certain materials in its possession that could be helpful in advancing our dialogue. While we do not want to distract from that dialogue, we believe that the materials sought would assist both sides in fully appreciating the issues and hopefully resolving this matter short of a trial. Therefore, in the spirit of our ongoing conversation, we respectfully request the following materials (assuming the Government is in possession of such materials):

1. Notes and reports of any statements made, or information provided by Michael Hlady to any employee of the Federal Government or its agent (including but not limited to FBI, DOJ, SEC, FINRA);
2. Documents provided to any employee of the Federal Government or its agent (including but not limited to FBI, DOJ, SEC, FINRA) by Hlady concerning Steven Nerayoff or Alchemist;
3. Emails and text messages between Michael Hlady and FBI Agent Jordan Anderson or any other government agent;
4. Recordings made by Michael Hlady of Steven Nerayoff, [REDACTED] or [REDACTED];
5. Emails and text messages between Michael Hlady and [REDACTED], [REDACTED] or [REDACTED];

BRAFMAN & ASSOCIATES, P.C.

6. Recordings of Nerayoff not yet provided in discovery (including the totality of the recordings already provided, which appear to be incomplete);
7. To the extent that the FBI has created or maintained any file concerning Hlady and his status as an informant, information source or cooperator, such file would be relevant considering his charged status as a co-conspirator.
8. We also request an opportunity to examine any cell phone or personal computer, laptop, tablet or any other device in the possession of the government to search for the items sought in paragraphs 1-7.
9. Any reports or notes by members of the Federal Government regarding the arrest of Steven Nerayoff on September 19, 2019 and a copy of the warrant to search Mr. Nerayoff's home on that date.
10. A copy of the subpoena that Mr. Nerayoff received on February 27, 2018 pertaining to a purported investigation of Jonathan Lucas.
11. A copy of any notes and reports relating to Mark Bartlett, Esq contact with the NYC FBI office in September of 2018 relating to [REDACTED] Nerayoff, Hlady, [REDACTED] or [REDACTED].

Thank you again for your courtesy and cooperation.

Respectfully submitted,

Marc Agnifilo

cc. Zach Intrater  
Michael Scotto  
Steven Nerayoff